


ORIGINAL

CLERK OF DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

2021 FEB -2 PM 4:37  
CLERK 

UNITED STATES OF AMERICA

v.

No. 4:21-cr-24-Y

FAIZ ABDALLAHI (01)  
SEVERO ZAMORA (02)

**INDICTMENT**

The Grand Jury Charges:

Count One

Entry of Goods by Means of False Statement  
(Violation of 18 U.S.C. § 542; 18 U.S.C. § 2)

On or about May 15, 2017, within the Northern District of Texas, the defendants, **Faiz Abdallahi, Severo Zamora**, aided and abetted by each other, and others known and unknown to the Grand Jury, willfully and knowingly attempted to enter and introduce into the commerce of the United States imported merchandise (1) by means of false and fraudulent invoices, declarations, forms, and papers, and (2) false statements.

Specifically, defendants **Faiz Abdallahi, Severo Zamora**, aided and abetted by each other, and others known and unknown to the Grand Jury, attempted to enter and introduce a shipment containing approximately 2300 cylinders of R22 by submitting and causing to be submitted to United States Customs and Border Protection documents containing false and fraudulent statements and information, and procuring the making of false statements in said documents, namely, the false claims that the shipment contained

R32 refrigerant gas, with a HTS Code of 3824.78.0020, and a U.N. number of 3252, without reasonable cause to believe the truth of the statements.

In violation of 18 U.S.C. § 542; 18 U.S.C. § 2.

Counts Two-Five  
 Smuggling Goods into the United States  
 (Violation of 18 U.S.C. § 545; 18 U.S.C. § 2)

On or about the dates listed below, in the Northern District of Texas, the defendants, **Faiz Abdallahi, Severo Zamora**, aided and abetted by each other, and others known and unknown to the Grand Jury, knowingly and willfully, with intent to defraud the United States, made out and passed, and caused to be made out and passed, through a customhouse of the United States, the false and fraudulent invoices and other documents set forth below, in order to import into the United States a containers shipment which contained R22.

COUNT	DATE	FALSE AND FRAUDULENT DOCUMENT
2	5/15/2017	Entry/Immediate Delivery Form (CBP Form 3461) Indicating Shipment of Refrigerant Gas 32
3	5/10/2017	Arrival Notice/Freight Invoice Reference No. LAOI136307 indicating entry of Refrigerant Gas R32, U.N. No. 3252
4	5/1/2017	Commercial Invoice No. YT17031450 indicating entry of Refrigerant Gas R32, U.N. No. 3252
5	5/1/2017	Packing List for Invoice No. YT17031450 indicating the entry of Refrigerant Gas R32, U.N. No. 3252


In violation of 18 U.S.C. § 545; 18 U.S.C. § 2.

A TRUE BILL.

A handwritten signature, possibly reading "BJ", is written over a horizontal line.

FOREPERSON

PRERAK SHAH  
ACTING UNITED STATES ATTORNEY

A handwritten signature, "Douglas A. Allen", is written over a horizontal line.

DOUGLAS A. ALLEN  
Assistant United States Attorney  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

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THE UNITED STATES OF AMERICA

v.

FAIZ ABDALLAHI (01)  
SEVERO ZAMORA (02)

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INDICTMENT

18 U.S.C. § 542; 18 U.S.C. § 2  
Entry of Goods by Means of False Statement  
1 Count

18 U.S.C. § 545; 18 U.S.C. § 2  
Smuggling Goods into the United States  
4 Counts

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A true bill rendered

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DALLAS



FOREPERSON

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Filed in open court this 2nd day of February, 2021.

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Summons to Issue as to Defendant (01) and Defendant (02)

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UNITED STATES MAGISTRATE JUDGE  
Criminal Magistrate Number: 4:20-MJ-780-BJ